CLERK US DISTRICT COURT NORTHERN DIST, OF TX

## FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION THE UNITED STATES DISTRICT COURT FILED. 17 FILED. 17 AM 10: 21

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UNITED STATES OF AMERICA

Case No. 3:16-CR-446-M

v.

BENITO ESPINOZA JR. (1)

a.k.a. Ben

a.k.a. Benny

DEWAYNE WHITE ADAMS (2)

a.k.a. Goldie

MICHELLE COURTNEE WALLACE (3)

AUDIE VITTORIO STEELE (4)

a.k.a. Red

JIMMIE EUGENE ROCHELLE (5)

a.k.a. Red Dog

a.k.a. Red

CHRISTOPHER BRANDON WELLS (7)

MARIE VICTORIA AGUILAR (10)

CHRISTA RENAE SUDDETH (11)

a.k.a. Jadie

JONATHAN ANDREW JANSKY (14)

a.k.a. Drew

## **MOTION FOR DETENTION**

The United States moves for pretrial detention of defendants, Benito Espinoza

Jr., a.k.a. Ben, a.k.a. Benny; Dewayne White Adams, a.k.a. Goldie; Michelle

Courtnee Wallace; Audie Vittorio Steele a.k.a. Red; Jimmie Eugene Rochelle, a.k.a.

Red Dog, a.k.a. Red; Christopher Brandon Wells; Marie Victoria Aguilar; Christa

Renae Suddeth, a.k.a. Jadie; Jonathan Andrew Jansky, a.k.a. Drew,, pursuant to 18

U.S.C. §3142(e) and (f).

- 1. <u>Eligibility of Case</u>. This case is eligible for a detention order because the case involves:
  - 10 + year drug offense
  - Serious risk defendant will flee
- 2. <u>Reason for Detention</u>. The Court should detain defendant because there are no conditions of release which will reasonably assure:
  - Defendant's appearance as required
  - Safety of any other person and the community
- 3. <u>Rebuttable Presumption</u>. The United States will invoke the rebuttable presumption against defendant because:
  - Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C.§924(c)
- 4. <u>Time For Detention Hearing.</u> The United States requests the Court conduct the detention hearing,
  - After continuance of <u>2</u> days (not more than 3).

[NOTHING FURTHER ON THIS PAGE]

## DATED this 11<sup>th</sup> day of October 2016.

Respectfully submitted,

JOHN R. PARKER UNITED STATES ATTORNEY

PHELESA M. GUY

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## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served on counsel for the defendant in accordance with the Federal Rules of Criminal Procedure on October 11, 2016.

PHELESA M. GUY

Assistant United States Attorney